



September 20, 2023

VIA ECF

Judge Naomi Reice Buchwald/Magistrate Stewart Aaron
Southern District of New York
500 Pearl Street
New York, New York 10007

RE: Case Index No 23-CV-7637
Continued Misconduct of Defendant AUST Gregory Zipes

Dear Hon Buchwald:

As per the attached Defendant AUST Gregory Zipes of the U.S. Trustee continues to abuse, harass, sabotage, gaslight, and otherwise behave like an animal during our bankruptcy proceedings, most notably today at our court ordered deposition.

Rahul D. Manchanda, Esq.
Manchanda Law Office PLLC
30 Wall Street, 8th Floor
Suite 8207
New York, New York 10005
Tel: (212) 968-8600

Subject: COMPLAINT AGAINST ASSISTANT US TRUSTEE GREGORY ZIPES AND HIS SIDEKICK BHEMKE TRANSCRIBER MISSY LEONETTI

From: "RAHUL MANCHANDA, ESQ." <rdm@manchanda-law.com>

Date: 9/20/2023, 12:33 PM

To: ustrustee.program@usdoj.gov, USTP.Region02@usdoj.gov, 12126682361@efaxsend.com, AO_OJI@ao.uscourts.gov, Admin Oversight <AdminOversight@ao.uscourts.gov>, ustrustee.program@usdoj.gov, 14155975606@efaxsend.com, AskDOJ@usdoj.gov, OPR.FOIA@usdoj.gov, Civil.Feedback@usdoj.gov

Executive Office for U.S. Trustees
441 G Street, NW
Suite 6150
Washington, DC 20530

By Email: **USTWeb**

LINDA A. RIFFKIN, ASSISTANT U.S. TRUSTEE
OFFICE OF THE UNITED STATES TRUSTEE – MANHATTAN OFFICE
ALEXANDER HAMILTON CUSTOM HOUSE
ONE BOWLING GREEN, ROOM 534
NEW YORK, NY 10004-1408
Phone: (212) 510-0500

Counsel
Office of Professional Responsibility
950 Pennsylvania Avenue, N.W., Suite 3266
Washington, D.C. 20530-0001

This is a formal complaint against the following stemming from the "deposition" that took place today.

Behnke Transcription Services Missy Leonetti - throughout the deposition, Ms Leonetti made it very clear that she was extremely biased in favor of Assistant US Attorney Gregory Zipes, as she repeatedly insulted me, cut me off, threatened me, disrespected me, sabotaged the transcripts, and chastised me for "interrupting" even though AUST Gregory Zipes did most of the interrupting. Ms Leonetti made it clear that since the US Trustee Gregory Zipes was paying for her transcription services that she was loyal and beholden to him, at my expense. She also exceeded the scope of her duties by terminating the deposition early because Gregory Zipes did not like my answers to his questions, as he was constantly trying to entrap, gaslight, interrupt, and word salad me to death in our deposition today. Ms Leonetti also threatened that she did not adequately transcribe our 3 hour deposition because we were "talking over one another." She was an unprofessional, biased, racist witch, and she should be severely disciplined.

Assistant US Attorney Gregory Zipes - as was briefly stated above, AUST Gregory Zipes relentlessly gaslighted me, interrupted me, insulted me, cut me off, talked over me but then accused me of doing that, would not accept my answers to his questions, threw temper tantrums, and otherwise obstructed and sabotaged this deposition because he did not like my answers to his questions. In addition, I advised him numerous times that the various slides/sheets he showed me on the screen

were not filled in by me, but by my former bankruptcy attorney Bruce Bronson, and that even though I signed wet signatures for Bruce Bronson, he used none of them on the "signatures" that Zipes was showing me, all stating /s/Rahul Manchanda, which means I never viewed, saw, or signed off on those documents, but this just angered Gregory Zipes. Zipes also got angry when I told him that my CPA/Bookkeeper/Accountants Michael Arons and Marc Albaum could only answer certain questions, as Bruce Bronson could only answer bankruptcy questions that he filled in. Truly unprofessional and a discredit to the bankruptcy court government profession.

Be guided accordingly.

Thanks,

Kind regards,

--

Rahul D. Manchanda, Esq.
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Suite 8207
New York, NY 10005
Tel: (212) 968-8600
Mob: (646) 645-0993
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U.S. News and World Report Listed Lawyer.

Licensed New York State Real Estate Broker.

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Subject: ZoomGov Information: Behmke Job 9/20/23 Manchanda Examination @ 9:30 AM EST

Date: Tue, 19 Sep 2023 17:05:22 +0000

From: Behmke Reporting and Video Services <Schedule@behmke.com>

To: rdm@manchanda-law.com <rdm@manchanda-law.com>

Good Morning,

The ZoomGov information for tomorrow's examination is listed below and attached.

Behmke Room01 is inviting you to a scheduled ZoomGov meeting.

Topic: Behmke Job 9/20/23 Manchanda Examination @ 9:30 AM EST

Time: Sep 20, 2023 06:30 AM Pacific Time (US and Canada)

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Tamia Lopez

Scheduling Coordinator

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Attachments:

09-20-23 Manchanda - ZoomGov Information.docx

12.6 KB

Subject: Form submission from: How to File a Complaint with the Office of Professional Responsibility
From: Department of Justice <no-reply@usdoj.gov>
Date: 9/20/2023, 12:29 PM
To: INFO@MANCHANDA-LAW.COM

Submitted on: Wednesday, September 20, 2023 - 12:29PM EDT Submitted to: Anonymous Submitted values are:

Name of person seeking OPR's action (Complainant)*: Mr.

First: RAHUL

Middle: DEV

Last: MANCHANDA

Suffix (if applicable): ESQ

Complainant Type: Private Attorney

Inmate/Detainee Number:

Other:

Company/Organization: MANCHANDA LAW OFFICE PLLC

Complainant mailing address: MANCHANDA LAW OFFICE PLLC, 30 WALL STREET 8TH FLOOR, SUITE 8207

City: NEW YORK

State: New York

Zip: 10005

Complainant email address: INFO@MANCHANDA-LAW.COM

Complainant phone number: 2129688600

Complainant fax number: 2129688601

If you are filing this complaint as a legal or other representative of the Complainant, please provide the following information:

Name and title of the filer:

First:

Middle:

Last:

Suffix (if applicable):

Your preferred mailing address:

City:

State:

Zip:

Your email address:

Information about the DOJ Attorney or DOJ Law Enforcement Official You Are Complaining About (Subject)

Name of the person(s) you are complaining about (Subject): Mr.

First: GREGORY
Middle:
Last: ZIPES
Suffix (if applicable):
Subject's Job Title: Assistant United States Trustee
Other:
Company/Organization: US TRUSTEE SDNY
Location of Subject's Office: 1 BOWLING GREEN, NEW YORK NY 10004

Does your complaint involve more than one person? Yes (If yes, please provide the following information of the additional subject.)

Name of the person(s) of the second subject:

First: MISSY

Middle:

Last: LEONETTI

Suffix (if applicable):

Second Subject's Job Title: Other (Please specify below)

Other: SDNY BANKRUPTCY COURT PRIVATE DEPOSITION TRANSCRIBER

Location of second subject's office: BHEMKE DEPOSITION TRANSCRIBERS - Behmke San Francisco

Home Office: 455 Market Street, Suite 970 San Francisco, California 94105 Tel: 415.597.5600 Fax: 415.597.5606 Toll free: 800.335.3376

Information about your complaint

What are the actions, events, or allegations that you are reporting to OPR? (e.g., attorney misconduct, Whistleblower retaliation, Giglio/Brady violation, etc.): Attorney Misconduct

When did the incident occur?: 2023-09-20

*Please provide a brief description summarizing the:

* reason(s) for your complaint including the details, actions, events, or allegations,

* case names,

* potential witnesses and their involvement,

* where the incident occurred,

* how the incident occurred, and

* any corrective actions already taken

* For *Whistleblower complaints only* – describe the personnel action(s) that occurred or failed to occur because of a protected disclosure: (an appointment, a promotion, an action under 5 U.S.C. Chapter 75 or other disciplinary or corrective action; a detail, transfer, or reassignment; a reinstatement; a restoration; a reemployment; a decision about pay, benefits or awards, concerning education or training if the education or training may reasonably be expected to lead to an

appointment, promotion, performance evaluation or other action described in 5 U.S.C. § 2302 (a)(2); a performance evaluation under 5 U.S.C. Chapter 43; a decision to order psychiatric testing or examination; or any other significant change in duties, responsibilities, or working conditions.)

Please provide a brief summary of the complaint:

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441 G Street, NW
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By Email:USTWeb

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Scheduling Coordinator

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